

**UNITED STATES DISTRICT FOR  
THE NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION**

|                               |   |                         |
|-------------------------------|---|-------------------------|
| ANGELICA JUNIOUS,             | ) |                         |
|                               | ) |                         |
| Plaintiff,                    | ) |                         |
|                               | ) | Case No. 22 CV 3681     |
| v.                            | ) |                         |
|                               | ) | Honorable Judge Chang   |
| SGT. W. BAKER #3159,          | ) |                         |
| R/O C. CHENGARY #16269,       | ) |                         |
| R/LT PURCELL #758,            | ) | Magistrate Judge Valdez |
| OFFICER NEALON # 18420        | ) |                         |
| OFFICER WALZ #18563           | ) |                         |
| OFFICER RAHN #17086,          | ) |                         |
| OFFICER GLAZIERS, COOK COUNTY | ) |                         |
| SHERIFF TOM DART,             | ) |                         |
| and COOK COUNTY, ILLINOIS,    | ) | JURY TRIAL DEMANDED     |
|                               | ) |                         |
| Defendants.                   | ) |                         |

**REPLY IN SUPPORT OF PLAINTIFF’S MOTION FOR PROTECTIVE ORDER  
PURSUANT TO FED. R. CIV. P. 26(c)(1)(E)**

**I. REPLY**

Defendants’ response is a classic example for the need to genuinely listen when participating in a Rule 37.2 conference. Those conferences are intended to avoid the need for motion practice instead of becoming fodder for a second round of arguing over issues that should not be debated. It does nothing but waste time and needlessly increase fees.

Unwilling to outright admit it, the County Defendants have tacitly conceded that they are in agreement with the parameters for Plaintiff’s deposition; (1) the deposition should be taken at the office of Plaintiffs’ counsel; and (2) that Ms. Skinner, *during breaks*, can console or aid Plaintiff if she should so require, *but without discussing the substance of her testimony*.

As such Plaintiff respectfully request that the Court enter an order consistent with this now apparent understanding.

Respectfully submitted,

PLAINTIFF ANGELICA JUNIOUS

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 4, 2023, the foregoing **Reply in Support of Plaintiff's Motion for Protective Order Pursuant to Fed. R. Civ. P. 26(c)(1)(E)** was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois by filing through the CM/ECF system, which served a copy of the foregoing upon all counsel of record.

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/s/ Devlin Joseph Schoop